

GOTTLIEB & ASSOCIATES
ATTORNEYS

150 E. 18th St., Suite PHR • New York, NY 10003
Tel (212) 228-9795 • Fax (212) 982-6284
NYJG@aol.com

January 11, 2024

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Espinal v. AJS Creations LLC*,
Case No.: 1:23-cv-8841

Dear Judge Torres,

The undersigned represents Frangie Espinal (“Plaintiff”) in the above referenced matter against Defendant, AJS Creations LLC, (“Defendant”) (collectively the “Parties”). We write, with Defendant’s consent, to inform the Court that the Parties have reached a settlement in principle and respectfully request that Your Honor dismiss this action with prejudice with the right to reopen in forty-five (45) days if the Settlement Agreement is not consummated. In light of the anticipated settlement, the undersigned respectfully requests all currently pending deadlines in this action be adjourned *sine die*.

We thank the Court for its time and attention in this matter.

Respectfully submitted,
/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.

cc: All counsel of record via ECF